

The claim 1 method operates within specific equipment of a particular environment; specifically, an environment where a telephone is connected to a broadband interface module, the module is connected to a cable, and the cable is connected to a PSTN interface. The method is carried out in the broadband interface module. This is reflected in both the preamble of the claim and within the remainder of the claim. To correlate this environment to the Ju reference, it appears that one of the Ju telephones, for example 42a corresponds to the telephone of claim 1, module 20 of Ju corresponds to the broadband interface module, service provider network 12 corresponds to the cable, and gateway 14 corresponds to the PSTN interface. The method would have to be carried out in module 20.

The functionality of module 20 is described in paragraph 37 of the Ju reference, and it is clear that it acts merely as a routing element. Frames that arrive from the cable are distributed to circuits 22, 24, or 26 based on information contained in the frames' headers and/or time slot in which the frames are received, and data that is destined to the service provider is built into frames of appropriate protocol and cast onto the cable.

There is absolutely no motivation given in Ju for making module 20 more complex than it is. To the extent that one becomes cognizant of the DeFazio et al reference and wishes to acquire the benefits thereof, the obvious direction is to actually implement the DeFazio et al teachings *as taught by DeFazio et al*; i.e., implement the two-tier process of obtaining and providing names to correlate with the called party's number in the terminating switch within PSTN 18.

The combination of Ju and DeFazio provides no motivation for installing a local database within module 20, no motivation for creating circuitry for accessing the local database within module 20, no motivation analyzing results of the accessing within module 20, and no motivation for sending data request message upstream toward to PSTN within module 20. Module 20 contains none of these elements, or capabilities, and obtaining the benefits of the DeFazio et al reference does not suggest the inclusion of such elements or capabilities.

Additionally, no mechanism for sending messages (in contrast to data) upstream from module 20 exists in the Ju reference, which would be required if the DeFazio et al teachings were to be included within module 20.

In short, it is respectfully submitted that claim 1 is not obvious in view of the Ju and DeFazio et al references, and neither are claims 2-9, which depend on claim 1.

In view of the submitted terminal disclaimer and the above remarks it is believed that all of the rejections have been overcome. Reconsideration and allowance of the outstanding claims are respectfully requested.

Respectfully,
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